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7 Attorney for Plaintiff, William S. Gonzalez, Sr.  
8 and Jeanette Gonzalez

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 IN RE: BARD IVC FILTERS  
13 PRODUCTS LIABILITY LITIGATION  
14

Case No: 2:15-MD-02641-DGC

15  
16 This Document Relates to Plaintiffs:

Civil Case No: 2:16-cv-02254-DGC

17  
18 WILLIAM S. GONZALEZ, SR.,  
19 and JEANETTE GONZALEZ  
20

**UNOPPOSED MOTION FOR  
LEAVE TO AMEND COMPLAINT**

21 Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure,  
22 moves this Court for an order amending the Complaint.  
23

24 1. Plaintiffs seek leave to file the attached Second Amended Master Short Form  
25 Complaint for Damages for Individual Claims and Demand for Jury Trial to correct  
26 Paragraph 10 to read "X G2® X Vena Cava Filter" instead of "X G2® Vena Cava  
27 Filter" (see Second Amended Master Short Form Complaint for Damages for Individual  
28

1 Claims and Demand for Jury Trial).

2 2. Plaintiffs' counsel has conferred with Defendants' counsel and Defendants do  
3 not oppose the filing of this motion.  
4

5 Based on the foregoing, William S. Gonzalez, Sr., and Jeanette Gonzalez  
6 request that this Court grant this request to correct Paragraph 10 to read "X G2® X Vena  
7 Cava Filter," and for leave to file the Second Amended Master Short Form Complaint for  
8 Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the  
9 attached Second Amended Master Short Form Complaint for Damages for Individual  
10 Claims and Demand for Jury Trial.  
11

12  
13 DATED: October 5th, 2017

14  
15 /s/ Joseph R. Johnson  
16 Joseph R. Johnson, Fla Bar #372250  
17 Attorneys for Plaintiffs, William S. Gonzalez, Sr., and  
18 Jeanette Gonzalez  
19

20 CERTIFICATE OF SERVICE

21 I hereby certify that on this 5th day of October, 2017, I electronically transmitted  
22 the attached document to the Clerk's Office using the CM/ECF System for filing and  
23 transmittal of a Notice of Electronic Filing.  
24

25  
26 /s/ Joseph R. Johnson  
27 JOSEPH R. JOHNSON  
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